

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD)(SN) ECF Case

**DECLARATION OF JOHN M. EUBANKS IN SUPPORT OF PLAINTIFFS’
EMERGENCY MOTION TO SUBSTITUTE PARTIES**

JOHN M. EUBANKS, Esquire, hereby states under penalty of perjury that:

1. I am a member of the law firm of Motley Rice LLC, attorneys for the Plaintiffs in the above-captioned matters. I submit this Declaration in support of this motion on behalf of the Plaintiffs identified in Exhibit A (attached hereto) from the action titled *Thomas Burnett, Sr., et al., v. The Islamic Republic of Iran, et al.*, 15-cv-9903-GBD-SN (“*Burnett/Iran*”).

2. The sources of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm’s representation of the *Burnett/Iran* Plaintiffs listed in Exhibit A in connection with the September 11th terror attacks, and conversations and other communications with these plaintiffs and other family members of these plaintiffs.

3. The Plaintiffs listed on Exhibit A entered into contracts of representation with Motley Rice LLC between 2002 and 2005. These contracts provided authority to file litigation on behalf of the Plaintiffs for damages or other relief arising out of the terrorist attacks on September 11, 2001 and permitted Motley Rice LLC to file additional legal actions as they deemed appropriate pursuant to this authority.

4. When these contracts were entered, certain of the Plaintiffs listed on Exhibit A requested that they be permitted to proceed pseudonymously as “DOE” Plaintiffs despite encouragement by counsel both at the time of entering the contract and since that time to proceed in their own names.

5. When Motley Rice LLC submitted its initial Complaint in this action (ECF No. 1) and the Amended Complaint (ECF No. 53), those individuals proceeding as “DOE” Plaintiffs were specifically named and tracked by Motley Rice LLC according to specific “DOE” identifying information in Motley Rice LLC’s client management software.

6. For those Plaintiffs listed on Exhibit A who did not proceed under a “DOE” moniker but have changed their names since initially signing contracts with Motley Rice LLC, these name changes have been verified through the process of preparing applications for submission to the U.S. Victims of State Sponsored Terrorism Fund on behalf of these various individuals.

7. This Declaration is intended to provide sufficient information for the Court to satisfy itself that these individuals have been Plaintiffs in this litigation since its outset and are not now being filed as part of a “placeholder” process of naming “DOE” Plaintiffs in the litigation without actually representing a contracted party.

8. As evidence that any inclusion of “DOE” Plaintiffs in the pleadings in this matter were references to specific individuals—and more specifically the individuals listed on Exhibit A—Plaintiffs submit that the “DOE” Plaintiffs were not relegated to the end of the list of Plaintiffs in the caption, and the allegations in the Complaint are specific as they relate to these “DOE” Plaintiffs.

9. To further underline this point, this declaration will provide the following information for each of the Plaintiffs listed on Exhibit A: (1) the date of the contract executed by the individual Plaintiff; (2) the manner of authorization in hand for these Plaintiffs to proceed in the capacity in which they are proceeding; and (3) the manner in which they have permitted themselves to proceed as “DOE” Plaintiffs and then to consent to proceed in their own names.

10. **Plaintiff Deborah Calandrillo**—as the spouse of Joseph M. Calandrillo and the Personal Representative of the Estate of Joseph M. Calandrillo—executed a contract of representation with Plaintiffs’ counsel on August 21, 2002. The contract specifies that Ms. Calandrillo sought to be named as a “Jane Doe” Plaintiff. On August 30, 2002, Letters Testamentary were issued to Deborah Calandrillo on behalf of her husband’s estate by Pike County, Pennsylvania’s probate court. In the Amended Complaint, Deborah Calandrillo was identified as SPOUSE DOE AP139, and Joseph M. Calandrillo was named as DOE AP139. Deborah Calandrillo has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

11. **Plaintiff Kathleen V. Pfitzer (a/k/a Kathleen Cappers)**—as the spouse of James C. Cappers and the Personal Representative of the Estate of Joseph C. Cappers—executed a contract of representation with Plaintiffs’ counsel on March 8, 2004. On August 8, 2002, Letters of Administration were issued to Kathleen Cappers on behalf of her husband’s estate by the Suffolk County Surrogate’s Court in New York. She has subsequently remarried and changed her last name.

12. **Plaintiff Helaine K. Chairnoff**—as the spouse of Jeffrey M. Chairnoff and the Personal Representative of the Estate of Jeffrey M. Chairnoff—executed a contract of representation with Plaintiffs’ counsel on August 26, 2002. The contract specifies that Ms.

Chairnoff sought to proceed as a “Jane Doe” Plaintiff. On December 26, 2001, Letters Testamentary were issued to Helaine K. Chairnoff on behalf of her husband’s estate by the Mercer County Surrogate’s Court in New Jersey. In the Amended Complaint, Helaine K. Chairnoff was identified as SPOUSE DOE AP104, and Jeffrey M. Chairnoff was named as DOE AP104. Helaine K. Chairnoff has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

13. **Plaintiff Michelle R. Chalcoff (a/k/a Mable Chalcoff; Mabel Chalcoff)**—as the spouse of William Alexander Chalcoff and as the Personal Representative of the Estate of William Alexander Chalcoff—executed a contract of representation with Plaintiffs’ counsel on June 25, 2005. On May 20, 2002, Letters of Administration were issued to Mabel Chalcoff on behalf of her husband’s estate by the Nassau County Surrogate’s Court in New York. Ms. Chalcoff subsequently officially changed her first name which was only recently transmitted to Plaintiffs’ counsel.

14. **Plaintiff June Coppola (a/k/a June Colaio)**—as the spouse of Mark J. Colaio and as the Personal Representative of the Estate of Mark J. Colaio—executed a contract of representation with Plaintiffs’ counsel on May 17, 2003. On April 15, 2002, Letters of Administration were issued to June Colaio on behalf of her husband’s estate by the New York County Surrogate’s Court in New York. She has subsequently remarried and changed her last name.

15. **Plaintiff Elodie Coleman**—as the spouse of Keith Eugene Coleman and as the Personal Representative of the Estate of Keith Eugene Coleman—executed a contract of representation with Plaintiffs’ counsel on August 29, 2002. The contract specifies that Ms. Coleman sought to be identified as a “Jane Doe” Plaintiff. On November 21, 2001, Letters of

Administration were issued to Elodie Coleman on behalf of her husband's estate in Somerset County Surrogate's Court in New Jersey. In the Amended Complaint, Elodie Coleman was identified as SPOUSE DOE AP127, and Keith Eugene Coleman was named as DOE AP127. Elodie Coleman has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a "DOE" Plaintiff.

16. **Plaintiff John J. Creamer**—as spouse of Tara Kathleen Creamer and as the Personal Representative of the Estate of Tara Kathleen Creamer—executed a contract with Plaintiffs' counsel on June 12, 2002. Mr. Creamer asked to be named as a "John Doe" Plaintiff. On November 5, 2001, Letters of Administration were issued to John J. Creamer on behalf of his wife's estate in the Worcester Division Probate and Family Court Department in Massachusetts. In the Amended Complaint, John J. Creamer was identified as SPOUSE DOE AP75, and Tara Kathleen Creamer was named as DOE AP75. John J. Creamer has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a "DOE" Plaintiff.

17. **Plaintiff Virginia M. Bowrosen (a/k/a Virginia M. DeCola)**—as spouse of Paul DeCola and as the Personal Representative of the Estate of Paul DeCola—executed a contract with Plaintiffs' counsel on July 30, 2003. On January 9, 2002, Letters of Administration were issued to Virginia M. DeCola on behalf of her husband's estate by the Queens County Surrogate's Court in New York. She has subsequently remarried and changed her last name.

18. **Plaintiff Michele Pizzo (a/k/a Michele DeFazio)**—as spouse of Jason DeFazio and as the Personal Representative of the Estate of Jason DeFazio—executed a contract with Plaintiffs' counsel on August 7, 2002. On January 4, 2002, Letters of Administration were issued

to Michele DeFazio on behalf of her husband's estate by the Richmond County Surrogate's Court in New York. She has subsequently remarried and changed her last name.

19. **Plaintiff Elizabeth Emery**—as spouse of Edgar Hendricks Emery, Jr. and as the Personal Representative of the Estate of Edgar Hendricks Emery, Jr.—executed a contract with Plaintiffs' counsel on August 28, 2002. The contract specifies that Ms. Emery sought to be identified as a "Jane Doe" Plaintiff. On November 15, 2001, Letters Testamentary were issued to Elizabeth Emery on behalf of her husband's estate in Passaic County Surrogate's Court in New Jersey. In the Amended Complaint, Elizabeth Emery was identified as SPOUSE DOE AP140, and Edgar Hendricks Emery, Jr. was named as DOE AP140. Elizabeth Emery has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a "DOE" Plaintiff.

20. **Plaintiff Dawn Picciano (a/k/a Dawn Esposito)**—as spouse of Francis Esposito and as the Personal Representative of the Estate of Francis Esposito—executed a contract with Plaintiffs' counsel on June 19, 2005. On September 26, 2002, Letters of Administration were issued to Dawn Esposito on behalf of her husband's estate by the Richmond County Surrogate's Court in New York. She has subsequently remarried and changed her last name.

21. **Plaintiff Peter Gadiel**—as parent of James Andrew Gadiel and as the Personal Representative of the Estate of James Andrew Gadiel—executed a contract with Plaintiffs' counsel on August 2, 2002. Mr. Gadiel subsequently demanded that he be listed as a "John Doe" Plaintiff prior to be included in any public filings. On December 17, 2002, a Fiduciary's Probate Certificate naming Peter Gadiel as Administrator of his son's estate was issued by the District of Kent Court of Probate in Connecticut. In the Amended Complaint, Peter Gadiel was identified as PARENT DOE AP86, and James Andrew Gadiel was named as DOE AP86. Peter Gadiel has recently

provided authorization in writing to be named according to his legal name on the public docket rather than as a “DOE” Plaintiff.

22. **Plaintiff Amy Kassan (a/k/a Amy Gardner)**—as sibling of Jeffrey B. Gardner and as Personal Representative of the Estate of Jeffrey B. Gardner—executed a contract with Plaintiffs’ counsel on July 30, 2003. On December 26, 2001, Letters of Administration were issued to Amy Gardner on behalf of her brother’s estate by the Hudson County Surrogate’s Court in New York. Ms. Kassan has subsequently married and changed her last name.

23. **Plaintiff Jean Marie Gray**—as spouse of James Michael Gray and as the Personal Representative of the Estate of James Michael Gray—executed a contract with Plaintiffs’ counsel on August 20, 2002. Ms. Gray sought to be identified as a “Jane Doe” Plaintiff. On March 4, 2003, Letters of Administration were issued to Jean Marie Gray on behalf of her husband’s estate in Richmond County Surrogate’s Court in New York. In the Amended Complaint, Jean Marie Gray was identified as SPOUSE DOE AP102, and James Michael Gray was named as DOE AP102. Jean Marie Gray has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

24. **Plaintiff Eileen T. Hoey**—as spouse of Patrick Aloysius Hoey and as the Personal Representative of the Estate of Patrick Aloysius Hoey—executed a contract with Plaintiffs’ counsel on April 17, 2002. Ms. Hoey subsequently demanded that she be listed as a “Jane Doe” Plaintiff prior to be included in any public filings. On January 7, 2002, Letters Testamentary were issued to Eileen T. Hoey on behalf of her husband’s estate by the Monmouth County Surrogate’s Court in New Jersey. In the Amended Complaint, Eileen T. Hoey was identified as SPOUSE DOE AP3, and Patrick Aloysius Hoey was named as DOE AP3. Eileen T. Hoey has recently provided

authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

25. **Plaintiff Gabrielle Hoffman**—as spouse of Stephen G. Hoffman and as the Personal Representative of the Estate of Stephen G. Hoffman—executed a contract with Plaintiffs’ counsel on September 5, 2002. The contract specifies that Ms. Hoffman sought to be identified as a “Jane Doe” Plaintiff. On December 10, 2001, Letters Testamentary were issued to Gabrielle Hoffman on behalf of her husband’s estate in Nassau County Surrogate’s Court in New York. In the Amended Complaint, Gabrielle Hoffman was identified as SPOUSE DOE AP153, and Stephen G. Hoffman was named as DOE AP153. Gabrielle Hoffman has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

26. **Plaintiff Kurt D. Horning**—as parent of Matthew D. Horning and as the Personal Representative of the Estate of Matthew D. Horning—executed a contract with Plaintiffs’ counsel on May 16, 2003. The contract specifies that Mr. Horning sought to be identified as a “John Doe” Plaintiff. On April 9, 2002, Letters of Administration were issued to Kurt D. Horning on behalf of his son’s estate in Hudson County Surrogate’s Court in New York. In the Amended Complaint, Kurt D. Horning was identified as PARENT DOE AP225, and Matthew D. Horning was named as DOE AP225. Kurt D. Horning has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a “DOE” Plaintiff.

27. **Plaintiff Tamara Kanter**—as spouse of Sheldon Robert Kanter and as the Personal Representative of the Estate of Sheldon Robert Kanter—executed a contract with Plaintiffs’ counsel on June 18, 2002. The contract specifies that Ms. Kanter sought to be identified as a “Jane Doe” Plaintiff. On November 14, 2001, Letters of Administration were issued to

Tamara Kanter on behalf of her husband's estate by the Middlesex County Surrogate's Court in New Jersey. In the Amended Complaint, Tamara Kanter is identified as SPOUSE DOE AP55, and Sheldon Robert Kanter is named as DOE AP55. Tamara Kanter has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a "DOE" plaintiff.

28. **Plaintiff Sandra Pangborn (a/k/a Sandra Lang)**—as spouse of Brendan Mark Lang and as the Personal Representative of the Estate of Brendan Mark Lang—executed a contract with Plaintiffs' counsel on August 15, 2002. On August 13, 2002, Letters of Administration were issued to Sandra Pangborn on behalf of her husband's estate by the Monmouth County Surrogate's Court in New Jersey. She has subsequently remarried and changed her last name.

29. **Plaintiff Robert Lanza, Jr.**—as spouse of Michele Lanza and as the Personal Representative of the Estate of Michele Lanza—executed a contract with Plaintiffs' counsel on August 23, 2002. Mr. Lanza subsequently requested to be named as a "John Doe" Plaintiff in any public filings. On November 15, 2001, Letters of Administration were issued to Robert Lanza, Jr. on behalf of his wife's estate by the Richmond County Surrogate's Court in New York. In the Amended Complaint, Robert Lanza, Jr. is identified as SPOUSE DOE AP137, and Michele Lanza is named as DOE AP137. Robert Lanza, Jr. has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a "DOE" plaintiff.

30. **Plaintiff Mark Lichtschein**—as sibling of Edward Lichtschein and as the Personal Representative of the Estate of Edward Lichtschein—executed a contract with Plaintiffs' counsel on August 19, 2002. Mr. Lichtschein asked to be named as a "John Doe" Plaintiff. On December 12, 2001, Letters of Administration were issued to Mark Lichtschein on behalf of his brother's

estate in the Kings County Surrogate's Court in New York. In the Amended Complaint, Mark Lichtschein was identified as SIBLING DOE AP93, and Edward Lichtschein was named as DOE AP93. Mark Lichtschein has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a "DOE" Plaintiff.

31. **Plaintiff Alan Patrick Linton (a/k/a A. Patrick Linton)**—as parent of Alan Patrick Linton, Jr. and as the Personal Representative of the Estate of Alan Patrick Linton, Jr.—executed a contract with Plaintiffs' counsel on February 28, 2003. On June 6, 2002, Letters of Administration were issued to Alan Patrick Linton on behalf of his son's estate in the Hudson County Surrogate's Court in New York. Mr. Linton's name is now provided in full without a first-name initial.

32. **Plaintiff Jonathan Dodge**—as spouse of Vita Marino and as the Personal Representative of the Estate of Vita Marino—executed a contract with Plaintiffs' counsel on June 22, 2002. The contract specifies that Mr. Dodge did not want his name or his wife's name used in public documents. On May 7, 2002, Letters Testamentary were issued to Jonathan Dodge on behalf of his wife's estate by the New York County Surrogate's Court in New York. In the Amended Complaint, Jonathan Dodge is identified as SPOUSE DOE AP81, and Vita Marino is named as DOE AP81. Jonathan Dodge has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a "DOE" plaintiff.

33. **Plaintiff Aida Martinez**—as spouse of Jose Angel Martinez, Jr. and as the Personal Representative of the Estate of Jose Angel Martinez, Jr.—executed a contract with Plaintiffs' counsel on August 15, 2002. Ms. Martinez asked to be named as a "Jane Doe" Plaintiff. On October 15, 2002, Letters of Administration were issued to Aida Martinez on behalf of her husband's estate in the Suffolk County Surrogate's Court in New York. In the Amended

Complaint, Aida Martinez was identified as SPOUSE DOE AP247, and Jose Angel Martinez, Jr. was named as DOE AP247. Aida Martinez has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

34. **Plaintiff Sherry McHeffey**—as parent of Keith McHeffey and as the Personal Representative of the Estate of Keith McHeffey—executed a contract with Plaintiffs’ counsel on August 27, 2002. The contract specifies that Ms. McHeffey sought to be identified as a “Jane Doe” Plaintiff. On October 15, 2001, Letters of Administration were issued to Sherry McHeffey on behalf of her son’s estate in Monmouth County Surrogate’s Court in New Jersey. In the Amended Complaint, Sherry McHeffey was identified as PARENT DOE AP122, and Keith McHeffey was named as DOE AP122. Sherry McHeffey has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

35. **Plaintiff Lisa Goldberg-McWilliams**—as Domestic Partner of Martin Edward McWilliams and as the Personal Representative of the Estate of Martin Edward McWilliams—executed a contract with Plaintiffs’ counsel on September 16, 2002. Ms. Goldberg-McWilliams asked to be named as a “Jane Doe” Plaintiff. On June 28, 2002, Letters of Administration were issued to Lisa Goldberg-McWilliams on behalf of Martin Edward McWilliams’ estate in the New York County Surrogate’s Court in New York. In the Amended Complaint, Lisa Goldberg-McWilliams was identified as SPOUSE DOE AP182, and Martin Edward McWilliams was named as DOE AP182. Lisa Goldberg-McWilliams has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

36. **Plaintiff Holly Ann Miller Hedley (a/k/a Holly Ann Miller)**—as spouse of Craig James Miller and as the Personal Representative of the Estate of Craig James Miller—executed a contract with Plaintiffs’ counsel on September 1, 2004. On August 28, 2002, a Certificate/Letter of Qualification as Administrator was issued to Holly Ann Miller on behalf of her husband’s estate in the Prince William County Circuit Court in Virginia. She has subsequently remarried and changed her last name.

37. **Plaintiff Mary Belding**—as spouse of Peter C. Moutos and as the Personal Representative of the Estate of Peter C. Moutos—executed a contract with Plaintiffs’ counsel on September 20, 2002. The contract specifies that Ms. Belding sought to be identified as a “Jane Doe” Plaintiff. On November 8, 2001, Letters of Administration were issued to Mary Belding on behalf of her husband’s estate in Morris County Surrogate’s Court in New Jersey. In the Amended Complaint, Mary Belding was identified as SPOUSE DOE AP189, and Peter C. Moutos was named as DOE AP189. Mary Belding has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

38. **Plaintiff Rosemary O. Murray (a/k/a Rory Owens Murray)**—as spouse of John J. Murray and as the Personal Representative of the Estate of John J. Murray—executed a contract with Plaintiffs’ counsel on September 9, 2002. On January 23, 2003, Letters Testamentary were issued to Rosemary Murray on behalf of her husband’s estate by the Hudson County Superior Court in New Jersey. Ms. Murray’s name is now provided in full without the use solely of a nickname.

39. **Plaintiff Edna Velez-Mundo (a/k/a Edna Kang Ortiz)**—as spouse of Pablo Ortiz and as the Personal Representative of the Estate of Pablo Ortiz—executed a contract with Plaintiffs’ counsel September 27, 2002. On December 6, 2002, Letters of Administration were

issued to Edna Kang-Ortiz in the Richmond County Surrogate's Court in New York. She has subsequently remarried and changed her last name.

40. **Plaintiff Inez Slick (a/k/a Inez Paskins)**—as spouse of Jerrold H. Paskins and as the Personal Representative of the Estate of Jerrold H. Paskins—executed a contract with Plaintiffs' counsel on August 4, 2003. Inez Paskins was named as the Executor in Jerrold H. Paskins Last Will and Testament which provided a pour-over trust. She has subsequently remarried and changed her last name.

41. **Plaintiff Devora W. Kirschner (a/k/a Devora Wolk Pontell)**—as spouse of Darin Howard Pontell and as the Personal Representative of the Estate of Darin Howard Pontell—executed a contract with Plaintiffs' counsel on September 5, 2003. On October 16, 2001, Letters of Administration were issued to Devora Pontell on behalf of her husband's estate in Montgomery County, Maryland. She has subsequently remarried and changed her last name.

42. **Plaintiff Michael J. Puckett**—as child of John F. Puckett and as the Personal Representative of the Estate of John F. Puckett—executed a contract with Plaintiffs' counsel on June 17, 2002. The contract specifies that Mr. Puckett sought to be identified as a "John Doe" Plaintiff. On June 21, 2002, Letters of Administration were issued to Michael J. Puckett on behalf of his father's estate in Nassau County Surrogate's Court in New York. In the Amended Complaint, Michael J. Puckett was identified as CHILD DOE AP90, and John F. Puckett was named as DOE AP90. Michael J. Puckett has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a "DOE" Plaintiff.

43. **Plaintiff Jacqueline A. Pykon**—as spouse of Edward R. Pykon and as the Personal Representative of the Estate of Edward R. Pykon—executed a contract with Plaintiffs' counsel on

August 26, 2002. The contract specifies that Ms. Pykon sought to be identified as a “Jane Doe” Plaintiff. On November 13, 2001, Letters of Administration were issued to Jacqueline A. Pykon on behalf of her husband’s estate in Mercer County Surrogate’s Court in New Jersey. In the Amended Complaint, Jacqueline A. Pykon was identified as SPOUSE DOE AP94, and Edward R. Pykon was named as DOE AP94. Jacqueline A. Pykon has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

44. **Plaintiff Jeanne Reinig-Smith**—as spouse of Thomas Barnes Reinig and as the Personal Representative of the Estate of Thomas Barnes Reinig—executed a contract with Plaintiffs’ counsel on June 11, 2002. The contract specifies that Ms. Reinig-Smith sought to be identified as a “Jane Doe” Plaintiff. On November 5, 2001, Letters Testamentary were issued to Jeanne Reinig-Smith on behalf of her husband’s estate in Somerset County Surrogate’s Court in New Jersey. In the Amended Complaint, Jeanne Reinig-Smith was identified as SPOUSE DOE AP49, and Thomas Barnes Reinig was named as DOE AP49. Jeanne Reinig-Smith has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

45. **Plaintiff Jim D. Richards**—as sibling of Claude Daniel Richards and as the Personal Representative of the Estate of Claude Daniel Richards—executed a contract with Plaintiffs’ counsel on February 14, 2003. By letter to counsel, Mr. Richards requested to be named as a “John Doe” Plaintiff. On April 24, 2002, Letters of Administration were issued to Jim D. Richard on behalf of his brother’s estate in the New York County Surrogate’s Court in New York. In the Amended Complaint, Jim D. Richards was identified as SIBLING DOE AP213, and Claude Daniel Richards is named as DOE AP213. Jim D. Richards has recently provided authorization in

writing consenting to be named according to his legal name on the public docket rather than as a “DOE” plaintiff.

46. **Plaintiff Elaine M. Brophy (a/k/a Elaine M. Rizza)**—as spouse of Paul V. Rizza and as the Personal Representative of the Estate of Paul V. Rizza—executed a contract with Plaintiffs’ counsel on March 20, 2003. On December 11, 2001, Letters of Administration were issued to Elaine M. Rizza on behalf of her husband’s estate in the Bergen County Surrogate’s Court in New Jersey. She has subsequently remarried and changed her last name.

47. **Plaintiff Thomas H. Roger**—as parent of Jean Destrehan Roger and as the Personal Representative of the Estate of Jean Destrehan Roger—executed a contract with Plaintiffs’ counsel on May 12, 2002. The contract specifies that Mr. Roger sought to be identified as a “John Doe” Plaintiff. On July 15, 2002, Letters of Administration were issued to Thomas H. Roger on behalf of her daughter’s estate in the Hampden Division Probate and Family Court Department in Massachusetts. In the Amended Complaint, Thomas H. Roger was identified as PARENT DOE AP279, and Jean Destrehan Roger was named as DOE AP279. Thomas H. Roger has recently provided authorization in writing consenting to be named according to his legal name on the public docket rather than as a “DOE” Plaintiff.

48. **Plaintiff Maureen Sherry**—as spouse of John Anthony Sherry and as the Personal Representative of the Estate of John Anthony Sherry—executed a contract with Plaintiffs’ counsel on August 28, 2002. The contract requests that she be named anonymously. On March 5, 2002, Letters Testamentary were issued to Maureen Sherry on behalf of her husband’s estate in the Nassau County Surrogate’s Court in New York. In the Amended Complaint, Maureen Sherry was identified as SPOUSE DOE AP143, and John Anthony Sherry was named as DOE AP143.

Maureen Sherry has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” plaintiff.

49. **Plaintiff Joanne E. Smith**—as spouse of Karl T. Smith and as the Personal Representative of the Estate of Karl T. Smith—executed a contract with Plaintiffs’ counsel on September 25, 2002. The contract specifies that Ms. Smith sought to be identified as a “Jane Doe” Plaintiff. On October 26, 2001, Letters Testamentary were issued to Joanne E. Smith on behalf of her husband’s estate in Monmouth County Surrogate’s Court in New Jersey. In the Amended Complaint, Joanne E. Smith was identified as SPOUSE DOE AP185, and Karl T. Smith was named as DOE AP185. Joanne E. Smith has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

50. **Plaintiff Ellen Shaw Bakalian**—as spouse of Jeffrey R. Smith and as the Personal Representative of the Estate of Jeffrey R. Smith—executed a contract with Plaintiffs’ counsel on August 30, 2002. Ms. Bakalian asked to be named as a “Jane Doe” Plaintiff. On September 30, 2002, Letters Testamentary were issued to Ellen Shaw Bakalian on behalf of her husband’s estate in the New York County Surrogate’s Court in New York. In the Amended Complaint, Ellen Shaw Bakalian was identified as SPOUSE DOE AP133, and Jeffrey R. Smith was named as DOE AP133. Ellen Shaw Bakalian has recently provided authorization in writing consenting to be named according to her legal name on the public docket rather than as a “DOE” Plaintiff.

51. **Plaintiff Lorraine Catalano (a/k/a Lorraine Spear)**—as spouse of Robert W. Spear, Jr. and as the Personal Representative of the Estate of Robert W. Spear, Jr.—executed a contract with Plaintiffs’ counsel on December 26, 2002. On July 23, 2002, Letters of Administration were issued to Lorraine Spear on behalf of her husband’s estate in the Rockland

County Surrogate's Court in New York. She has subsequently remarried and changed her last name.

52. **Plaintiff Jeanie M. Somerville (a/k/a Jean Somerville)**—sibling of Gregory Stajk and as the Personal Representative of the Estate of Gregory Stajk—executed a contract with Plaintiffs' counsel on May 16, 2003. On December 10, 2001, Letters of Administration were issued to Jean M. Somerville on behalf of her brother's estate in the Nassau County Surrogate's Court in New York. Ms. Somerville goes by both "Jean" and "Jeanie".

53. **Plaintiff Linda Buffa Uliano (a/k/a Linda Buffa)**—as spouse of Michael A. Uliano and as Personal Representative of the Estate of Michael A. Uliano—executed a contract with Plaintiffs' counsel on August 2, 2003. On January 11, 2002, Letters of Administration were issued to Linda Buffa on behalf of her husband's estate in the Monmouth County Surrogate's Court in New Jersey. Linda Buffa Uliano goes by both Linda Buffa and Linda Buffa Uliano.

54. **Plaintiff Maria A. Visciano (a/k/a Marie Visciano)**—as the parent of Joseph Gerard Visciano and as the Personal Representative of the Estate of Joseph Gerard Visciano—executed a contract with Plaintiffs' counsel on August 12, 2002. On May 8, 2002, Letters of Administration were issued to Marie Visciano on behalf of her son's estate in the Richmond County Surrogate's Court in New York. Maria Visciano uses both "Maria" and "Marie" as interchangeable for her first name.

55. **Plaintiff Shirimattie Lalman (a/k/a Shirimattie Vukosa)**—as spouse of Alfred Vukosa and as the Personal Representative of the Estate of Alfred Vukosa—executed a contract with Plaintiffs' counsel on January 6, 2003. On January 16, 2003, Letters of Administration were issued to Shirimattie Vukosa on behalf of her husband's estate in the Kings County Surrogate's Court in New York. Shirimattie Lalman is her maiden name.

56. **Plaintiff Sheila A. Zarba-Campbell (a/k/a Sheila A. Kiernan)**—as spouse of Christopher R. Zarba, Jr. and as the Personal Representative of the Estate of Christopher R. Zarba, Jr.—executed a contract with Plaintiffs’ counsel on September 15, 2004. On September 6, 2002, Letters of Administration were issued to Sheila A. Kiernan on behalf of her husband’s estate in the Middlesex Division Probate and Family Court Department in Massachusetts. She has subsequently remarried and changed her last name.

57. The *Burnett/Iran* Plaintiffs identified in Exhibit A who were “DOE” Plaintiffs in the Amended Complaint seek to substitute their actual names on the public docket rather than appearing solely in a “DOE” capacity.

58. The *Burnett/Iran* Plaintiffs identified in Exhibit A who were not “DOE” Plaintiffs in the Amended Complaint seek to substitute their current name along with their “a/k/a” names on the public docket.

59. These individuals have prepared applications to submit to the U.S. Victims of State Sponsored Terrorism Fund by the February 19, 2020 deadline, and they request that the Court expeditiously grant the relief sought herein to allow it to enter judgments on Plaintiffs’ pending motions at ECF Nos. 5669 and 5670.

60. A proposed Order granting the Emergency Motion to Substitute Parties is being filed contemporaneously with this Declaration.

Dated: February 14, 2020

/s/ John M. Eubanks
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